

the complaint of plaintiff Medline Industries, LP (“Plaintiff”). In support of this motion, Defendants state as follows:

1. On April 6, 2022, three of the four named Defendants (all but Lake Worth Enterprise, LLC) timely filed a Notice of Removal based on diversity jurisdiction. (Dkt. 1). On April 8, 2022, Defendant Lake Worth Enterprise, LLC, filed its consent to the Notice of Removal. (Dkt. 7).

2. On motion of Defendants (Dkt. 8), Defendants were granted until May 13, 2022 to respond to the complaint. (Dkt. 11).

3. On May 11, 2022, counsel for Plaintiff, an Illinois limited partnership, provided to counsel for Defendant a declaration from Plaintiff’s General Counsel, Alex Liberman, indicating that a sixth degree limited partner of Plaintiff is a quasi-governmental entity organized under the laws of the State of Florida, and located exclusively in Florida.

4. Based on the representations made by Plaintiff’s General Counsel under oath, there appears to be lack of complete diversity of citizenship between Plaintiff and Defendants. *See Page v. Democratic Nat’l Committee*, 2 F.4th 630, 634 (7th Cir. 2021); *West v. Louisville Gas & Elec. Co.*, 951 F.3d 827, 830 (7th Cir. 2020).

5. Plaintiff does not oppose remand and requested Defendants remand the complaint to the Circuit Court of Cook County.

WHEREFORE, for the reasons stated above, Defendants request the Court remand the complaint to the Circuit Court of Cook County, and for any further relief the Court deems proper.

Dated: May 13, 2022

Respectfully submitted,

HIALEAH ENTERPRISE, LLC., a Florida Limited Liability Company and d/b/a HIALEAH NURSING AND REHAB CENTER and d/b/a HIALEAH CONVALESCENT HOME and DELRAY GROUP, LLC., a Florida Limited Liability Company and d/b/a LAKE VIEW CARE CENTER and LAKE WORTH ENTERPRISE, LLC., a Florida Limited Liability Company and d/b/a OASIS HEALTH AND REHABILITATION CENTER and BOCA GROUP, LLC., a Florida Limited Liability Company and d/b/a MENORAH HOUSE LAKE WORTH ENTERPRISE, LLC, a Florida Limited Liability Company and d/b/a OASIS HEALTH AND REHABILITATION CENTER

By: _____ /s/ Steven L. Baron
One of their attorneys

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CERTIFICATE OF SERVICE

I, Steven L. Baron, an attorney in the law firm BARON HARRIS HEALY, certify that on May 13, 2022, I filed a copy of the foregoing document electronically using the Court's CM/ECF System, which will generate notice of this filing to all counsel of record:

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